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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: :
: **Chapter 11**
: **Case No. 05-17930 (ALG)**
:
:
NORTHWEST AIRLINES CORPORATION, et al.,:
:
: **(Jointly Administered)**
:
Debtors. :
:
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**DESIGNATION OF ITEMS TO BE INCLUDED IN RECORD ON APPEAL AND
STATEMENT OF ISSUES PRESENTED**

Pursuant to Bankruptcy Rule 8006, Appellant the Association of Flight Attendants – CWA, AFL-CIO (“AFA”) hereby submits its designation of items to be included in the record on appeal of the Bankruptcy Court’s April 24, 2007 Order denying AFA’s Motion for Relief from the Judgment and Order Authorizing Debtors to Reject Their Collective

Bargaining Agreement Covering Flight Attendants, as well as a statement of the issues to be presented on appeal.

DESIGNATION OF ITEMS TO BE INCLUDED IN RECORD ON APPEAL

AFA designates the following items to be included in the record on appeal:

1. Memorandum of Opinion Regarding Debtors' Section 1113 Application, dated June 29, 2006 (Docket No. 2962);
2. Order Authorizing Rejection of Debtors' Collective Bargaining Agreement, dated July 5, 2006 (Docket No. 2998);
3. AFA's Motion for Relief from Judgment and Order Authorizing Debtors to Reject Their Collective Bargaining Agreement Covering Flight Attendants with Proposed Order and Certificate of Service, dated February 12, 2007 (Docket No. 4834);
4. AFA's Memorandum in Support of AFA's Motion for Relief from the Judgment and Order Authorizing Debtors to Reject Their Collective Bargaining Agreement Covering Flight Attendants with Exhibits A-E, dated February 12, 2007 (Docket No. 4835);
5. AFA's Motion to File Under Seal the Declaration of Daniel W. Akins in Support of its Motion for Relief from the Judgment and Order Authorizing Debtors to Reject Their Collective Bargaining Agreement Covering Flight Attendants with Proposed Order, dated February 12, 2007 (Docket No. 4836);
6. Declaration of Daniel W. Akins in Support of AFA's Motion for Relief from the Judgment and Order Authorizing Debtors to Reject Their Collective Bargaining

Agreement Covering Flight Attendants with Exhibit, dated February 13, 2007 (Redacted) (Docket No. 4857);

7. Declaration of Daniel W. Akins in Support of AFA's Motion for Relief from the Judgment and Order Authorizing Debtors to Reject Their Collective Bargaining Agreement Covering Flight Attendants with Exhibit (Unredacted);

8. AFA's Amended Motion for Relief from the Judgment and Order Authorizing Debtors to Reject Their Collective Bargaining Agreement Covering Flight Attendants, dated February 16, 2007 (Docket No. 4917);

9. The Official Committee of Unsecured Creditors' Objection to AFA's Motion for Relief from the Judgment and Order Authorizing Debtors to Reject Their Collective Bargaining Agreement Covering Flight Attendants, dated March 2, 2007 (Docket No. 5121);

10. Debtors' Memorandum of Points and Authorities in Opposition to AFA's Motion for Relief from the Judgment and Order Authorizing Debtors to Reject Their Collective Bargaining Agreement Covering Flight Attendants with Exhibits A and B, dated March 2, 2007 (Docket No. 5124);

11. AFA's Motion to File Under Seal the Reply Memorandum in Support of Its Motion for Relief from the Judgment and Order Authorizing Debtors to Reject Their Collective Bargaining Agreement Covering Flight Attendants and the Supplemental Declaration of Daniel W. Akins Akins in Support of AFA's Reply Memorandum in Support of AFA's Motion for Relief from the Judgment and Order Authorizing Debtors

to Reject Their Collective Bargaining Agreement, dated March 6, 2007 (Docket No. 5168);

12. AFA's Reply Memorandum in Support Of AFA's Motion for Relief from the Judgment and Order Authorizing Debtors to Reject Their Collective Bargaining Agreement Covering Flight Attendants (Redacted), dated March 7, 2007 (Docket No. 5175);

13. AFA's Reply Memorandum in Support Of AFA's Motion for Relief from the Judgment and Order Authorizing Debtors to Reject Their Collective Bargaining Agreement Covering Flight Attendants (Unredacted);

14. Supplemental Declaration of Daniel W. Akins in Support of AFA's Reply Memorandum in Support of AFA's Motion for Relief from the Judgment and Order Authorizing Debtors to Reject Their Collective Bargaining Agreement (Redacted and Unredacted);

15. AFA's Proposed Order Placing Confidential Information Contained in the Amended Supplemental Declaration of Daniel W. Akins in Support of AFA's Reply Memorandum in Support of AFA's Motion for Relief from the Judgment and Order Authorizing Debtors to Reject Their Collective Bargaining Agreement Covering Flight Attendants Under Seal, dated March 8, 2007 (Docket No. 5192);

16. AFA's Amended Motion to File Under Seal the Amended Supplemental Declaration of Daniel W. Akins in Support of AFA's Reply Memorandum in Support of AFA's Motion for Relief from the Judgment and Order Authorizing Debtors to Reject

Their Collective Bargaining Agreement Covering Flight Attendants, dated March 8, 2007 (Docket No. 5193);

17. Amended Supplemental Declaration of Daniel W. Akins in Support of AFA's Reply Memorandum in Support of AFA's Motion for Relief from the Judgment and Order Authorizing Debtors to Reject Their Collective Bargaining Agreement Covering Flight Attendants (Recated and Unredacted);

18. Transcript of Hearing Held on March 8, 2007 at 11:03 AM, Regarding AFA's Motion to File Under Seal the Declaration of Daniel W. Akins in Support of Its Motion for Relief from the Judgment and Order Authorizing Debtors to Reject Their Collective Bargaining Agreement Covering Flight Attendants, etc., dated March 27, 2007 (Docket No. 5733);

19. Transcript of Hearing Held on March 21, 2007 at 2:41 PM, Regarding Debtors' Tier III (B) Objection to Proofs of Claim Numbered 11283 and 11295, etc., dated March 21, 2007 (Docket No. 5738);

20. AFA's Supplemental Memorandum of Law in Support of Motion for Relief from the Judgment and Order Authorizing Rejection and in Opposition to Debtors' Tier III(B) Objection to Proofs of Claim Numbered 11283 and 11295 with Certificate of Service, dated April 5, 2007 (Docket No. 5837);

21. Debtors' Supplemental Brief in Support of Debtors' Tier III(B) Objection to Proofs of Claim Numbered 11283 and 11295 Filed by AFA and in Opposition to AFA's Motion for Relief from the Judgment and Order Authorizing Debtors to Reject

Their Collective Bargaining Agreement Covering Flight Attendants, dated April 5, 2007 (Docket No. 5839);

22. Memorandum of Opinion Regarding AFA's Motion for Relief and Debtors' Claim Objection, dated April 13, 2007 (Docket No. 6055); and

23. Order Denying AFA's Motion for Relief from the Judgment and Order Authorizing Debtors to Reject their Collective Bargaining Agreement Covering Flight Attendants, dated April 24, 2007 (Docket No. 6396).

STATEMENT OF ISSUES PRESENTED ON APPEAL

1. Whether the Bankruptcy Court erred in denying AFA relief pursuant to Fed. R. Civ. P. 60(b)(5).

2. Whether the Bankruptcy Court erred in denying AFA relief pursuant to Fed. R. Civ. P. 60(b)(6).

Respectfully submitted,

/s/ Robert S. Clayman
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Dated: New York, New York
May 3, 2007

CERTIFICATE OF SERVICE

I, Robert S. Clayman, declare that on this 3rd day of May, 2007, a true and correct copy of the foregoing Designation of Items to be Included in Record on Appeal and Statement of Issues Presented was served by electronic mail upon the following:

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Dated: May 3, 2007